

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

DAVID SMITH, a pseudonym,
Plaintiff,

v.

BROWN UNIVERSITY, et al.

Defendants.

C.A. No. 1:22-cv-00329-JJM-PAS

**DEFENDANT BROWN UNIVERSITY'S OPPOSITION
TO PLAINTIFF'S MOTION TO COMPEL RESPONSE TO
PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

For the reasons stated in its supporting memorandum, Defendant Brown University ("Brown") opposes Plaintiff's motion to compel (ECF Doc. 44).

Plaintiff improperly filed his motion to compel without first requesting an informal discovery conference with the Court as required by the Pretrial Order. Accordingly, Brown requests that the Court either conduct a discovery conference or hold a hearing to address the issues raised in Plaintiff's motion and Brown's opposition.

BROWN UNIVERSITY

By Its Attorney,

/s/ Steven M. Richard

Steven M. Richard (#4403)
Nixon Peabody LLP
One Citizens Plaza, Suite 500
Providence, RI 02903
srichard@nixonpeabody.com
Telephone: (401) 454-1020
Facsimile: (866) 947-1332
Dated: August 22, 2023

CERTIFICATE OF SERVICE

I certify that, on the 22nd day of August, 2023, I filed and served this opposition through the Court's CM/ECF system.

/s/ Steven M. Richard